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IN THE UNITED STATES DISTRICT COURT

DISTRICT OF UTAH, CENTRAL DIVISION

VISION SECURITY, LLC, a Utah Limited Liability Company, ROB HARRIS, an individual,

Plaintiffs,

v.

XCENTRIC VENTURES, LLC, an Arizona Limited Liability Company,

Defendant.

DECLARATION OF ED MAGEDSON

Case No. 2:13-CV-00926

Judge Jill N. Parrish Chief Magistrate Judge Brooke C. Wells

ED MAGEDSON hereby declares as follows:

1. I am over 18 years of age, have personal knowledge of all matters stated herein, and am in all respects competent to make this Declaration.

- 2. I am the founder of www.ripoffreport.com ("Ripoff Report") and at all times relevant to the above-captioned matter, have been employed as the Manager of Xcentric Ventures, LLC ("Xcentric").
- 3. In that capacity, I handle a variety of business and operational matters on behalf of Xcentric, including:
 - a. Approving and implementing new policies and procedures;
 - b. Communicating with businesses that are interested in Xcentric's Ripoff
 Report Corporate Advocacy Business Remediation & Customer
 Satisfaction Program ("Corporate Advocacy Program" or "CAP");
 - c. Communicating with the authors of reports and rebuttals on Ripoff Report who contact Xcentric by telephone or email;
 - d. Helping consumers resolve a variety of complaints and other issues with businesses, using my years of experience dealing with unscrupulous businesses;
 - e. Assisting the media, including network news magazines and local TV news stations throughout the country, in their efforts to protect consumers by doing interviews, providing consumer tips, providing newsworthy topics and information, and connecting the media with consumers who wish to have their stories heard; and
 - f. Working closely with all levels of federal, state, and local law enforcement, including but not limited to, various state attorneys general, local and federal prosecutors, Homeland Security, the United States

Justice Department, US Customs and Border Patrol, the United States Secret Service, FBI, FTC, SEC, U.S. Postal Inspectors, and local police, and providing them with information used to locate victims, detect patterns of deceptive business practices, and prosecute violations of consumer protection laws, among other things.

- 4. I do not recall being contacted by Anthony Rees, by telephone, electronic communication, or otherwise, regarding the post he made on Ripoff Report about Vision Security, LLC ("Vision Security") and Rob Harris ("Harris"), a true and correct copy of which is attached as Exhibit 1 to the Declaration of Anette Beebe, filed concurrently herewith.
- 5. I do not recall receiving, prior to Vision Security and Rob Harris filing their Complaint (October 10, 2013), a copy of the Affidavit of Anthony Rees, dated September 17, 2013, a true and correct copy of which is attached as Exhibit 8 to the Declaration of Rachel L. Wertheimer, filed concurrently herewith.
- 6. In June 2012, Rob Harris contacted me via email to inquire about the Corporate Advocacy Program. As a result, he and I exchanged several emails regarding CAP in which he provided information about Vision Security and I provided detailed information about CAP. A true and correct copy of the emails Rob Harris and I exchanged in June 2012, entitled "the RATES = new application Corporate Advocacy Program 3 names 2 Reports?" produced by Xcentric in this matter (bates nos. XC000144-163), is attached hereto as Exhibit 1.
- 7. In July 2013, Rob Harris contacted me again via email to inquire about CAP and, as a result, we exchanged another round of emails in which he provided information about Vision Security and I provided information about CAP. A true and correct copy of the emails

Rob Harris and I exchanged in July 2013, entitled "the Rates – RE: new app – Corporate Advocacy Program – 16 Reports? Vision Security, Vision Home Security" produced by Xcentric in this matter (bates nos. XC000164-184), is attached hereto as Exhibit 2.

I declare under criminal penalty of the State of Utah that the foregoing is true and correct.

DATED this 3rd day of August 2015.

ED MAGEDSON